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Litigation + Business

VIA ELECTRONIC FILING

Honorable Jocelyn G. Boyd Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: Consolidated Docket Nos. 2017-207-E, 2017-305-E and 2017-370-E.

Dear Ms. Boyd:

On behalf of intervenors Central Electric Power Cooperative, Inc. and The Electric Cooperatives of South Carolina Inc., I am writing to support the South Carolina Office of Regulatory Staff's ("ORS") Motion to Compel Removal of Confidential Designation filed October 1, 2018, in the referenced proceedings. We share the opinion of counsel for the ORS that South Carolina Electric & Gas ("SCE&G") has engaged in a consistent practice of over-designating documents and deposition testimony as confidential in these combined proceedings.

In its motion, the ORS asks that SCE&G be required to narrow its claims of confidentiality within seven days of the date of the order. We support that request for all outstanding designations. In addition, we ask that a similar sevenday deadline be imposed for any designations made going forward in these proceedings. That requirement is especially important given the practice of SCE&G of issuing blanket confidentiality designations for depositions being taken in these proceedings.

Thank you for considering our view on the pending motion.

Yours truly,

Frank R. Ellerbe, III

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cc: Parties of Record (via email)